| 1 2 3 4 5 6 | Alfredo A. Bismonte (Cal. Bar. No. 136154) Remington A. Lenton-Young (Cal. Bar. No. 29 Beck, Bismonte & Finley, LLP 150 Almaden Blvd, 10 th Floor San Jose, CA 95113 Tel: (408) 938-7900 Fax: (408) 938-0790 Email: abismonte@beckllp.com rlenton-young@beckllp.com | 95392) |
|----------------------------|--|---|
| 7 | Attorneys for Third Party Witness John Salcido | |
| 8 | UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION | |
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| 11 | LEGALFORCE RAPC WORLDWIDE, P.C., | Case No. 3:17-CV-7303-MMC |
| 12 13 | Plaintiff, | [PROPOSED] ORDER IN LIGHT OF |
| 14 | V. | CONDITIONAL NON-OPPOSITION TO MOTION TO MODIFY PROTECTIVE |
| 15 | TRADEMARK ENGINE, LLC., | ORDER; VACATING HEARING |
| 16 | Defendants. | Date: October 4, 2019 Time: 9:00 AM |
| 17 | | Dept: Courtroom 7 Judge: Hon. Maxine M. Chesney |
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On February 4, 2019, the Court entered a Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (the "Protective Order"). Having considered Plaintiff LegalForce RAPC Worldwide, P.C.'s ("RAPC") Motion to Modify Protective Order and any responsive papers and argument, and good cause being found, the Court rules as follows:1

- 1. Notwithstanding any other provisions in the Protective Order, "Protected Material" provided pursuant to subpoena and designated by third party witnesses John Salcido and Heather Sapp as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to the Protective Order may be disclosed in proceedings relating to RAPC and its attorneys brought by the United State Patent and Trademark Office currently pending before an Administrative Law Judge of the Department of Housing and Urban Development and any associated USPTO investigations (collectively, the "USPTO Proceedings"), with no disclosures allowed in any other related matters. related case filed by RAPC.
- 2. To the extent deposition testimony has been corrected by John Salcido or Heather Sapp pursuant to Federal Rule of Civil Procedure 30(e), such corrections shall also be disclosed in the USPTO Proceedings.
- 3. Such disclosure in USPTO Proceedings shall be limited to a non-public manner consistent with the protections granted "Protected Material" under the Protective Order.

IT IS SO ORDERED.

Date: September 27, 2019

United States District Court Judge

The hearing scheduled for October 4, 2019, is hereby VACATED.